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Michele C. Farquhar
Partner
202-637-5663
mcfarquhar@hhlaw.com

VIA ELECTRONIC FILING

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: WT Docket No. 06-150

Dear Ms. Dortch:

On behalf of SpectrumCo LLC (“SpectrumCo”),¹ I am writing to express SpectrumCo’s support for the principles advocated in the April 18 letter filed in the above-referenced proceeding by the coalition supporting the Balanced Consensus Spectrum Band Plan (“Balanced Consensus Plan”) for the 700 MHz commercial spectrum. As a new entrant committed to providing wireless service, SpectrumCo urges the Commission to adopt a flexible 700 MHz band plan that could support a variety of business plans and ensure that the spectrum is made available to the bidders that value it most (rather than licensing schemes that may artificially favor only the largest wireless incumbents or particular business models).

Specifically, SpectrumCo agrees with the Balanced Consensus Plan supporters that the Commission should ensure that any proposed 700 MHz band plan include the following elements:

- In the upper 700 MHz band, the 20 MHz frequency block should be divided into two 10 MHz paired blocks, and at least one (and preferably both) of the two subdivided blocks should be available on a geographic area basis smaller than an REAG. SpectrumCo continues to favor EA-sized licenses in the upper 700 MHz band, based on the in-depth economic analysis it has submitted in the record.
- In the lower 700 MHz band, one of the paired frequency blocks should be licensed on a CMA basis, one paired block on an EA basis, and the remaining unpaired E block on an REAG basis.

¹ SpectrumCo is a Delaware limited liability company, managed by C Spectrum Investment, LLC, a subsidiary of Comcast Corporation. Class B equity owners of SpectrumCo are C Spectrum Investment, LLC; Time Warner Cable LLC, a subsidiary of Time Warner Inc.; Cox Wireless, Inc., a subsidiary of Cox Enterprises, Inc.; and Bright House Networks, LLC.

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These principles have been supported by an overwhelming majority of the commenters in this proceeding, many of whom have recently reiterated their support. Moreover, these principles reflect the Commission's statutory obligation to ensure "an equitable distribution of licenses and services among geographic areas" and to "avoid[] excessive concentration of licenses . . . by disseminating licenses among a wide variety of applicants, including small businesses, rural telephone companies, and businesses owned by members of minority groups and women."²

SpectrumCo continues to advocate a 700 MHz band plan featuring a mix of geographic area licenses similar to the "building block" model used in the Commission's successful Advanced Wireless Service ("AWS") auction, as supported by the two economic analyses prepared by economist Dr. Coleman Bazelon (filed in this docket by SpectrumCo on January 8, 2007 and March 6, 2007). SpectrumCo is concerned that a band plan unduly favoring large license areas will significantly limit auction participation for a range of potential bidders, including parties seeking EA licenses to complement licenses won in the AWS auction. As noted in Dr. Bazelon's paper, of 168 eligible bidders in the AWS auction, 153 never placed a bid on a continental REAG license. Conversely, there were no "REAG-only" bidders in the AWS auction, and all the major incumbent wireless carriers that participated (including Verizon Wireless, Cingular, and T-Mobile) won EA and/or CMA licenses in addition to REAG licenses.

In sum, SpectrumCo urges the Commission to facilitate strong demand for 700 MHz spectrum, faster deployment of wireless services, and reduction of post-auction transaction costs by adopting a 700 MHz license structure that would better parallel the flexible structure of the FCC's successful AWS auction. Consumers will benefit from the enhanced competition, greater choices, and lower prices fostered by providing bidders with the flexibility to tailor their bidding to assemble the most efficient spectrum configurations for their business purposes.

Sincerely,

/s/ Michele C. Farquhar

Michele C. Farquhar
Attorney for SpectrumCo

cc: Fred Campbell
Angela Giancarlo
Aaron Goldberger
Bruce Gottlieb
Barry Ohlson
Erika Olsen

² See 47 U.S.C. § 309(j)(4)(C)(i), (j)(3)(B).